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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 AUGUSTINE CALLEROS, JR.,

14 Plaintiff,

15 vs.

16 CITY OF NORTH LAS VEGAS, a municipal  
17 corporation,

18 Defendant.

CASE NO.: 2:23-cv-01340-GMN-DJA

**STIPULATION TO EXTEND DEADLINES  
TO RESPOND AND REPLY TO  
DEFENDANT’S MOTION FOR  
SUMMARY JUDGMENT [ECF No. 44]**

(Fifth Request)

19 Plaintiff, Augustine Calleros, Jr. (“Calleros”), by and through his counsel, Melanie Hill Law,  
20 and Defendant City of North Las Vegas (“CNLV”), by and through its counsel, Madison Zornes-Vela,  
21 hereby stipulate to extend the deadline for Mr. Calleros to respond to Defendant’s Motion for Summary  
22 Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of November 25, 2024 up  
23 to and including December 16, 2024. The parties further stipulate to extend the deadline for CNLV to  
24 reply in support of its Motion for Summary Judgment from the current deadline of December 16, 2024  
25 up to and including January 16, 2025. This Stipulation is made at the request of Plaintiff’s counsel for  
26 the reasons set forth herein. This is the fifth request to extend the deadline to respond to this dispositive  
27 motion.

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1 In support of this Stipulation and Order, the parties state as follows:

2 1. The current deadline for Plaintiff to respond to the Defendant's Motion for Summary  
3 Judgment filed on August 28, 2024 [ECF No. 44] is November 25, 2024. The parties have agreed to a  
4 fifth extension of the deadline from the current deadline of November 25, 2024 until December 16,  
5 2024.

6 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional  
7 extension of the response deadline due to an unexpected family emergency discussed in detail with  
8 counsel for Defendant and in light of the fact that the Court recently extended the settlement conference  
9 to February 20, 2025. Defendant's counsel agreed to the requested extension. The parties also agreed  
10 to extend the CNLV's reply deadline due to the upcoming holidays and the parties agreed to a one  
11 month extension of the reply deadline until January 16, 2024.

12 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a  
13 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to  
14 allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion  
15 considering the issues she has described herein constituting good cause for the extension.

16 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the  
17 deadline for Mr. Calleros to respond to Defendant's Motion for Summary Judgment filed on August  
18 28, 2024 [ECF No. 44] from the current deadline of November 25, 2024 to December 16, 2024.  
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1 The parties further respectfully request that the Court extend the deadline for Defendant to file  
2 its reply from the current deadline of December 16, 2024 up to and including January 16, 2025.

3 DATED this 25th day of November, 2024.

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5 Respectfully submitted,

6 MELANIE HILL LAW PLLC

7 /s/ Melanie Hill

8  
9 Melanie A. Hill, Esq. (NV Bar No. 8796)

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11 Las Vegas, NV 89134

12 Tel.: (702) 362-8500

13 *Attorney for Plaintiff Augustine Calleros, Jr.*

Respectfully submitted,

NORTH LAS VEGAS CITY ATTORNEY

/s/ Madison Zornes-Vela

Madison Zornes-Vela, Esq. (NV Bar No. 13626)

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North Las Vegas, Nevada 89030

Tel: (702) 633-1057

*Attorney for Defendant City of North Las Vegas*

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15 IT IS SO ORDERED:

16 **IT IS FURTHER ORDERED** that this Order  
17 **granting Parties' Stipulation to Extend Deadlines**  
18 **is the last extension the Court will grant**  
19 **regarding the response and reply deadlines to**  
20 **Defendant's Motion for Summary Judgment.**

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23 GLORIA M. NAVARRO  
24 UNITED STATES DISTRICT JUDGE

25 Dated: November 26, 2024.